

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

UNITED STATES OF)	
AMERICA,)	
)	
Plaintiff,)	
)	
V.)	CAUSE NO. 1:21-cr-288-JMS-MG
)	
JEREMY BARTLETT,)	
)	
Defendant.)	

GOVERNMENT'S SENTENCING MEMORANDUM

The United States of America, by and through the undersigned counsel, respectfully requests that the Court sentence the defendant, Jeremy Bartlett, to 137 months imprisonment. Such as sentence appropriately accounts for the defendant's criminal history and considers the nature and circumstances of the offense. Considering these circumstances, a sentence of 137 months is necessary to protect the public, deter the defendant and promote respect for the law, and send a deterrent message to others with a similar criminal history who choose to engage in drug trafficking.

SENTENCING RECOMMENDATION

I. Background

The PSR accurately outlines the nature and circumstances of the offense of conviction in this case. (Dkt. No. 56, PSR ¶¶ 7-9.) This memo will not repeat them here. The PSR accurately describes the procedural posture: the defendant entered a plea agreement with the United States, to plead guilty to Count One of the Indictment for Possession with Intent to Distribute 5 or more grams of methamphetamine (actual). (PSR ¶¶ 1-6.)

II. 18 U.S.C. § 3553(a) Factors

The factors set forth in § 3553(a) support a sentence of 137 months imprisonment.

The defendant's criminal history in this case is serious. He has 7 adult felony convictions and 8 adult misdemeanors on his record over a span of over 20 years for crimes that include criminal recklessness, intimidation, and drug related offenses. (PSR ¶¶ 33-44.) As a result of this criminal history, he was determined to be a criminal history category VI, the highest category available. (PSR ¶ 46.)

This offense shows that the defendant did not learn from his prior involvement in the criminal justice system. In this case, the defendant not only possessed with intent to distribute methamphetamine but also possessed a firearm during the offense. (PSR ¶¶ 8-9.) The danger in engaging in drug trafficking offenses while armed is clear. The defendant's behavior after getting caught was also disturbing. He got into a high-speed chase with officers where he crashed into

two officers' vehicle. (PSR ¶ 7.) This had the unfortunate result of one officer experiencing a concussion. *Id.*

This behavior demonstrates that the only way to deter the defendant from committing further crimes is jail time. A sentence of 137 months imprisonment would be a reasonable sentence to send the message to him and other similarly situated defendants that there are consequences to engaging in drug distribution while armed and injuring police officers in the process. Such a sentence would also accomplish the most important 3553(a) factor in this case, which is protection of the public from the crimes of the defendant. The defendant has a serious criminal history but engaged in dangerous conduct that could have had deadly consequences. His history indicates a high likelihood that he will continue committing crimes into the future. The Court needs to send the defendant a clear message that his behavior is unacceptable and must stop. A sentence of 137 months imprisonment would be an appropriate sentence to send that message.

WHEREFORE, based on the foregoing, the United States respectfully requests that the Court impose a sentence of 137months imprisonment.

Respectfully Submitted,

Zachary A. Myers
United States Attorney

By: s/Abhishek S. Kambli
Abhishek S. Kambli
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on **August 29, 2023**, the foregoing Government's Sentencing Memorandum was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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